

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF ILLINOIS**

CALEB BARNETT, et al.,	)	Case No. 3:23-cv-209-SPM
Plaintiffs,	)	**designated Lead Case
	)	
v.	)	
	)	
KWAME RAOUL, et al.,	)	
Defendants,	)	
	)	
DANE HARREL, et al.,	)	Case No. 3:23-cv-141-SPM
Plaintiffs,	)	
	)	
v.	)	
	)	
KWAME RAOUL, et al.,	)	
Defendants,	)	
	)	
JEREMY W. LANGLEY, et al.,	)	Case No. 3:23-cv-192-SPM
Plaintiffs,	)	
	)	
v.	)	
	)	
BRENDAN KELLY, et al.,	)	
Defendants,	)	
	)	
<b>FEDERAL FIREARMS LICENSEES OF ILLINOIS, et al.,</b>	)	<b>Case No. 3:23-cv-215-SPM</b>
<b>Plaintiffs,</b>	)	
	)	
v.	)	
	)	
<b>JAY ROBERT “J.B.” PRITZKER, et al.,</b>	)	
<b>Defendants.</b>	)	
	)	

**DECLARATION OF ERICH PRATT ON BEHALF OF  
PLAINTIFFS GUN OWNERS OF AMERICA, INC. & GUN OWNERS FOUNDATION**

1. I, Erich Pratt, am the Senior Vice President of Gun Owners of America, Inc. (“GOA”) and the Senior Vice President of Gun Owners Foundation (“GOF”); both are plaintiffs in the above-titled action. I am over the age of 18 and I make this declaration of my own

knowledge, except as to any matters stated therein on information and belief, and as to such matters I believe them to be true. If called as a witness, I could and would testify competently to the truth of the matters set forth herein.

2. GOA is a California non-stock corporation and a not-for-profit membership organization with its principal place of business in Springfield, Virginia, exempt from federal income taxes under Section 501(c)(4) of the U.S. Internal Revenue Code. GOA was formed in 1976 to preserve and defend the Second Amendment rights of gun owners. GOA has more than 2 million members and supporters across the country, including thousands of Illinois residents.

3. GOF is a Virginia non-stock corporation and a not-for-profit legal defense and educational foundation with its principal place of business in Springfield, Virginia, exempt from federal income taxes under Section 501(c)(3) of the U.S. Internal Revenue Code. GOF was formed in 1983 and is supported by gun owners across the country, including within Illinois.

4. While GOA and GOF are national organizations, each tries to communicate with its respective members and supporters in various states that are pushing onerous new gun control laws, particularly when GOA or GOF are involved in litigation challenging those laws, as is the case here. Invariably, GOA and GOF receive questions, concerns, and complaints from their members and supporters regarding how laws like Illinois's Protect Illinois Communities Act, House Bill 5471 ("PICA") may affect them.

5. I have received, seen, or heard about communications from various GOA members and GOF supporters who reside in Illinois, expressing concern that they lawfully owned and possessed in Illinois as of January 10, 2023, firearms and parts that PICA now restricts, of which they can no longer enjoy the lawful use because they refused to submit an endorsement affidavit for (i.e., register) those firearms or parts. I am aware of communications from various of those GOA members and GOF supporters who, but for fear of prosecution under PICA, would have continued to possess and use those firearms or parts within Illinois.

6. I am aware of communications from various GOA members and GOF supporters who reside in Illinois expressing concern that they cannot lawfully acquire and possess the

firearms or parts that they desire within Illinois, because PICA forbids doing so. I am aware of communications from various of those GOA members and GOF supporters expressing that, but for fear of prosecution under PICA, they would acquire and possess within Illinois firearms that PICA restricts as “assault weapons” and their related parts. Of particular concern from the member communications I am aware of are semiautomatic rifles with detachable magazines that have features that PICA restricts (e.g., pistol grips, adjustable stocks, etc.).

7. The number of GOA members and GOF supporters who reside in Illinois and are affected by PICA for one or more of the reasons explained above are too many to identify, but I am aware of and provide the following individuals as examples:

A. Stephen Knutson is a current resident of Illinois and member of Gun Owners of America who is directly harmed by PICA by: (1) losing the possession and use within Illinois of various firearms that he owns, because he removed them from Illinois because PICA restricts them, and he did not wish to submit an endorsement affidavit for (i.e., register) those firearms; (2) being unable to obtain in Illinois certain replacement or alternative parts to use on his currently owned firearms that PICA restricts with respect to repair or modification; and (3) being unable to obtain in Illinois additional firearms and parts that he has been wanting to acquire to use in Illinois for lawful purposes. Prior to January 10, 2023, Mr. Knutson owned and possessed at his home in Illinois firearms that PICA restricts. He used those firearms for various lawful purposes, including training, competition, and defense of himself, his family, and his home. Not desiring to register his firearms with the State, Mr. Knutson has moved multiple firearms that PICA restricts out of state, and is paying to have them stored, including some semiautomatic AR-platform rifles that accept detachable magazines and have a pistol grip, flash suppressor, barrel shroud, and adjustable stock. Mr. Knutson has thus entirely lost the use of those firearms within the State of Illinois, where he resides, for self-defense and for use in recreational and competitive shooting, as

well as for training. Additionally, he recently saw an advertisement on an auction for a .50 BMG rifle he desires to add to his collection, but did not bid on the rifle because PICA prohibits the acquisition and possession of such firearms and their ammunition. But for fear of prosecution under PICA for doing so, he would bring every firearm that he removed from the State because of PICA back into Illinois, and would acquire new firearms and parts that PICA prohibits, including a .50 BMG rifle and its ammunition.

- B. Todd Vandermyde is a current resident of Illinois and a member of Gun Owners of America who is directly harmed by PICA by (1) losing the possession and use within Illinois of various firearms and parts that he owns, because he removed them from Illinois because PICA restricts them and he did not wish to submit an endorsement affidavit for (i.e., register) those firearms and parts; (2) being unable to obtain in Illinois certain replacement or alternative parts to use on his currently owned firearms that PICA restricts, or for the purpose of building new firearms; (3) being unable to obtain in Illinois additional firearms he has been wanting to acquire for use in lawful purposes, such as self-defense; and (4) being forced to remove the threaded barrel from a handgun that he uses for self-defense in Illinois, and spend money to purchase a new non-threaded barrel. Prior to January 10, 2023, Mr. Vandermyde owned and possessed at his home in Illinois firearms and parts that PICA restricts. He used those firearms and parts for various lawful purposes, including training, competition, and defense of himself, his family, his dogs (from coyotes), and his home. Not desiring to register his firearms and parts with the State, he has moved multiple firearms and parts that PICA restricts out of state for storage, including at least one: (a) semiautomatic AR-platform rifle that accepts detachable magazines and has a pistol grip, flash suppressor, barrel shroud, and adjustable stock; (b) semiautomatic pistol that accepts detachable magazines and has the capacity to accept the magazine outside of the pistol grip, a

flash suppressor, and a barrel shroud (i.e., an AR-style Pistol); (c) threaded barrel for a semiautomatic pistol; (d) semiautomatic rifle chambered in .22LR because it accepts a detachable magazine and has a thumbhole stock; (e) semiautomatic shotgun that has a pistol grip; (f) semiautomatic shotgun that has a thumbhole stock; and (g) semiautomatic shotgun that has an internal magazine with a capacity to accept more than 5 rounds. But for fear of prosecution under PICA, Mr. Vandermyde would bring every firearm and part that he has removed from Illinois because of PICA back into Illinois. But for fear of prosecution under PICA, Mr. Vandermyde would acquire new firearms that PICA restricts, including a Browning 1919, a Barret M82, an Armalite AR180, several types of AK pattern firearms, a SVD Dragonov, and an HK MP5 type firearm; and would acquire new parts that PICA restricts, including pistol grips, stocks, barrel shrouds, and AR or AK receivers, in order to build new or modify already-owned rifles.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct, and that this declaration was executed on July 12, 2024, in Springfield, Virginia.

  
\_\_\_\_\_  
Erich Pratt  
Declarant

**CERTIFICATE OF SERVICE**

I hereby certify that on July 12, 2024, an electronic PDF of **DECLARATION OF ERICH PRATT ON BEHALF OF PLAINTIFFS GUN OWNERS OF AMERICA, INC. & GUN OWNERS FOUNDATION** was sent by electronic mail to the following registered attorneys participating in the case:

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Dated: July 12, 2024

s/ Laura Palmerin  
Laura Palmerin